

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2005 MAR 14 P 12:06
CIVIL ACTION NO. 04-12629-RWZ

U.S. DISTRICT COURT
DISTRICT OF MASS.

USGEN NEW ENGLAND, INC., a
Subsidiary of NATIONAL ENERGY &
GAS & GAS TRANSMISSION INC.,
f/k/a PG&E NATIONAL ENERGY
GROUP, INC.

Plaintiff

v.

BENTLY NEVADA, LLC., f/k/a
BENTLY NEVADA CORPORATION,
LLC and BENTLY PRESSURIZED
BEARING COMPANY, f/k/a BENTLY
NEVADA CORPORATION

Defendants

PLAINTIFF'S INITIAL
DISCLOSURES

As required by Rule 26(a) Plaintiff makes and serves the following initial disclosures.

Respectfully submitted,
USGEN NEW ENGLAND, INC.

By its attorney

Kathleen A. Kelley
BBO No. 562342
HARE & CHAFFIN
160 Federal Street
Boston, MA 02110

And



Brook F. Minx
TBN 00789905

William T. Sebesta
TBN 00784941
DONATO, MINX & BROWN, P.C.
3200 Southwest Freeway, Suite 2310
Houston, TX 77027
(713) 877-1112
FAX # (713) 877-1138
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record by certified mail, return receipt requested and/or hand delivery and /or facsimile on March 11, 2005.



BROOK F. MINX/WILLIAM T. SEBESTA

PLAINTIFF'S INITIAL DISCLOSURES

A. Individuals likely to have discoverable information

Bently Nevada Defendants

David Chapperon
Robert Attalini
Mike Humphrey
Erik Lindhjem
Jeff Gordon
Mike Troutman
Tom Donohue
John Kingham
Orese Kynik
Andy Heckman
Joe Meaney

These individuals may have knowledge about the work performed by the Bently defendants and/or the damages sustained by Plaintiff.

US GEN NEW ENGLAND, INC. f/k/a PG&E

Jeffrey Marrs
Wallace J. Ziehler
Allen W. Sload
Theodore Witman
Michael Moriarty
Steve Dulong
David Kelliher

These individuals may have knowledge of the work performed by defendants, the events surrounding the Salem Harbor Unit #2 Bearing #1 Failure, the loss, the cause of the loss, and/or the damages sustained as a result of the loss.

Siemens Westinghouse Power Corporation

48 Brooks Drive
Braintree, Massachusetts
(781) 380-1306

Rick Sennot -- Representative of Siemens Westinghouse who reviewed the Bently Nevada drawings and plans for alteration of the TSI system.

Richard J. Spicuzza -- Representative of Siemens Westinghouse who made the quote to rebabbit and remachine the #1 bearing.

Andy PHilbrook -- attended meeting.

Pioneer Motor Bearing

129 Battleground Road

Kings Mountain, North Carolina 28086

(888) 813-9001

Robert Swisher

Pioneer Motor Bearing repaired the damage done to the #1 bearing.

General Electric

Mike Kerkmann

Jeff Snow

B. Documents, data compilations, and tangible things

Plaintiff agrees to make all responsive, non-privileged documents, data compilations, and tangible things available for inspection and copying, at defendants' expense, at the offices of Donato Minx & Brown at a mutually agreeable date and time. These documents consist of the claim file for the first party claim for this loss.

C. Computation of Damages

Property Damage: \$1,034,822.00

The documents or other evidentiary material on which such computation is based are included in the documents referenced above.

D. Liability Insurance

Not applicable